

Exhibit 3

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

COREL SOFTWARE, LLC,

Plaintiff,

v.

MICROSOFT CORPORATION,

Defendant.

Case No. 2:15-cv-00528-JNP

**DEFENDANT MICROSOFT
CORPORATION'S OBJECTIONS AND
RESPONSES TO COREL SOFTWARE,
LLC'S FIRST SET OF REQUESTS FOR
PRODUCTION [NOS. 1-68]**

Judge Jill N. Parrish

Pursuant to Federal Rules of Civil Procedure 26 and 34, Microsoft Corporation

("Microsoft") hereby objects and responds to Plaintiff Corel Software, LLC's ("Corel") First Set

broad and unduly burdensome, in particular to the extent it is not limited to any specific timeframe or products.

Subject to and without waiver of the foregoing general and specific objections, Microsoft will produce responsive, relevant, nonprivileged documents, if any, to the extent that they are in Microsoft's possession, custody or control and/or can be located after a reasonable search.

REQUEST FOR PRODUCTION NO. 4:

Software incorporating Live Preview.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

Microsoft incorporates by reference each General Objection set forth above. Microsoft objects to this Request in its entirety as vague, ambiguous, overly broad and unduly burdensome, particularly to the extent the Request refers to products other than those listed in Corel's list of Accused Instrumentalities served on September 24, 2015. Microsoft further objects to this Request as overbroad and unduly burdensome and beyond the scope of permissible discovery to the extent it seeks information publically available or otherwise equally available to Corel. Microsoft further objects to this Request on the grounds that it seeks documents or information that is not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of the foregoing general and specific objections, Microsoft responds that it will make available for inspection the source code for the accused functionalities upon entry of a suitable Protective Order. Microsoft is willing to meet and confer with Corel in order to identify what additional documents, if any, are sought by this Request.

REQUEST FOR PRODUCTION NO. 5:

Software design documents relating to Live Preview.

Subject to and without waiver of the foregoing general and specific objections, Microsoft will produce responsive, relevant, nonprivileged documents, if any, to the extent that they are in Microsoft's possession, custody or control and/or can be located after a reasonable search.

REQUEST FOR PRODUCTION NO. 68:

Documents that Microsoft may rely on to oppose Corel's assertion of contributory infringement.

RESPONSE TO REQUEST FOR PRODUCTION NO. 68:

Microsoft incorporates by reference each General Objection set forth above. Microsoft objects to this Request as overbroad and unduly burdensome and beyond the scope of permissible discovery to the extent it seeks information publically available or otherwise equally available to Corel.

Subject to and without waiver of the foregoing general and specific objections, Microsoft will produce responsive, relevant, nonprivileged documents, if any, to the extent that they are in Microsoft's possession, custody or control and/or can be located after a reasonable search.

Dated: November 23, 2015

FISH & RICHARDSON P.C.

By: /s/ Jonathan J. Lamberson
Jonathan J. Lamberson

Attorneys for Defendant
MICROSOFT CORPORATION